FILED CLERK, U.S. DISTRICT COURT BILAL A. ESSAYLI 1 April 28, 2025 United States Attorney 2 MARK TAKLA CENTRAL DISTRICT OF CALIFORNIA Assistant United States Attorney 3 Chief, Orange County Office DEPUTY CAITLIN JEAN CAMPBELL (Cal. Bar No. 324364) 4 Assistant United States Attorney Ronald Reagan Federal Bldg. & U.S. Courthouse 5 411 West Fourth Street, Suite 8000 6 Santa Ana, California 92701 Telephone: 714-338-3541 7 E-mail: Caitlin.campbell@usdoj.gov 8 9 Attorneys for Plaintiff UNITED STATES OF AMERICA 10 UNITED STATES DISTRICT COURT 11 FOR THE CENTRAL DISTRICT OF CALIFORNIA 12 UNITED STATES OF AMERICA, No. 8:25-mj-00310-DUTY 13 Plaintiff, GOVERNMENT'S NOTICE OF 14 REQUEST FOR DETENTION v. 15 Jose Luis Martinez-Salvala, 16 also known as ("aka") "Jorge Ramirez Jr.," 17 aka "Jorge Junior Ramirez,", 18 Defendant. 19 20 Plaintiff, United States of America, by and through its counsel 21 of record, hereby requests detention of defendant and gives notice of 22 the following material factors: 23 \boxtimes 1. Temporary 10-day Detention Requested (§ 3142(d)) on the 24 following grounds: 25 present offense committed while defendant was on release 26 pending (felony trial), 27 28

 \boxtimes 1 b. defendant is an alien not lawfully admitted for 2 permanent residence; and 3 \boxtimes c. defendant may flee; or 4 \boxtimes pose a danger to another or the community. 5 \boxtimes 2. Pretrial Detention Requested (§ 3142(e)) because no 6 condition or combination of conditions will reasonably 7 assure: \boxtimes 8 the appearance of the defendant as required; a. \boxtimes 9 b. safety of any other person and the community. 10 3. Detention Requested Pending Supervised Release/Probation 11 Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C. § 3143(a)): 12 13 П defendant cannot establish by clear and convincing 14 evidence that he/she will not pose a danger to any 15 other person or to the community; 16 b. defendant cannot establish by clear and convincing 17 evidence that he/she will not flee. 18 4. Presumptions Applicable to Pretrial Detention (18 U.S.C. 19 § 3142(e)): П 20 Title 21 or Maritime Drug Law Enforcement Act ("MDLEA") (46 U.S.C. App. 1901 et seq.) offense with 10-year or 21 22 greater maximum penalty (presumption of danger to 23 community and flight risk); 24 П offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or b. 25 2332b(g)(5)(B) with 10-year or greater maximum penalty 26 (presumption of danger to community and flight risk); 27 28

| 1 | | | c. | offense involving a minor victim under 18 U.S.C. | | | | |
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| 2 | | | | §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, | | | | |
| 3 | | | | 2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4), | | | | |
| 4 | | | | 2260, 2421, 2422, 2423 or 2425 (presumption of danger | | | | |
| 5 | | | | to community and flight risk); | | | | |
| 6 | | | d. | defendant currently charged with an offense described | | | | |
| 7 | | | | in paragraph 5a - 5e below, <u>AND</u> defendant was | | | | |
| 8 | | | | previously convicted of an offense described in | | | | |
| 9 | | | | paragraph 5a - 5e below (whether Federal or | | | | |
| 10 | | | | State/local), AND that previous offense was committed | | | | |
| 11 | | | | while defendant was on release pending trial, AND the | | | | |
| 12 | | | | current offense was committed within five years of | | | | |
| 13 | | | | conviction or release from prison on the above- | | | | |
| 14 | | | | described previous conviction (presumption of danger to | | | | |
| 15 | | | | community). | | | | |
| 16 | \boxtimes | 5. | Government Is Entitled to Detention Hearing Under § 3142(f) | | | | | |
| 17 | | | If t | he Case Involves: | | | | |
| 18 | | | a. | a crime of violence (as defined in 18 U.S.C. | | | | |
| 19 | | | | § 3156(a)(4)) or Federal crime of terrorism (as defined | | | | |
| 20 | | | | in 18 U.S.C. § 2332b(g)(5)(B)) for which maximum | | | | |
| 21 | | | | sentence is 10 years' imprisonment or more; | | | | |
| 22 | | | b. | an offense for which maximum sentence is life | | | | |
| 23 | | | | imprisonment or death; | | | | |
| 24 | | | c. | Title 21 or MDLEA offense for which maximum sentence is | | | | |
| 25 | | | | 10 years' imprisonment or more; | | | | |
| 26 | | | d. | any felony if defendant has two or more convictions for | | | | |
| 27 | | | | a crime set forth in a-c above or for an offense under | | | | |
| 28 | | | | | | | | |

@ase 8:25-cr-00084-DOC Document 5 Filed 04/28/25 Page 4 of 5 Page ID #:15

| , . | Case 8:25-cı | r-00084-DOC | Document 5 | Filed 04/28/25 | Page 5 of 5 | Page ID #:16 | |
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| 2 | | Good cause t | for continu | ance in exces | s of three o | days exists in | 1 |
| 3 | | that: | | | | | |
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| 9 | Dated: A | April 28, 202 | 5 | Respectfully | submitted, | | |
| 10 | | | | BILAL A. ESSA | | | |
| 11 | | | | United States | Attorney | | |
| 12 | | | | MARK TAKLA Assistant Uni | ted States | Attorney | |
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| 15 | | | | CANTLIN JEAN Assistant Uni | | Attorney | |
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